



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 17, 2019

VIA ECF AND EMAIL

The Honorable Alison J. Nathan
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

**Re: United States v. Steven Rawlins,
15 Cr. 377/19 Cv. 0135 (AJN)**

Dear Judge Nathan:

The Government writes respectfully to request a final, one-week adjournment of its September 19, 2019 deadline to respond to the motion filed by defendant Steven Rawlins ("Rawlins") pursuant to Title 28, United States Code, Section 2255. On August 18, 2019, the Government requested its most recent adjournment of its filing deadline in order to, among other things, engage in further discussions with one of the victim companies in this matter, Core Choice, Inc., and to confer with prior defense counsel and the company concerning materials that were subject a confidentiality agreement.

Since the Court's granting of that adjournment, the Government has conducted further factual inquiry and has obtained a waiver of the confidentiality agreement that applied to the above-referenced materials (*i.e.*, a settlement agreement between former defense counsel and Core Choice, Inc.). Because Rawlins's motion raises numerous claims that require additional review and analysis of this agreement, the trial record, and other documents, the Government respectfully requests until September 26, 2019 to file its response. The Government will not seek any further adjournments of its filing deadline.

Thank you for your consideration of this request.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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Steven Brill, Esq. (via ECF)